

# COUNTY FIRE DEPARTMENT

OFFICE OF THE FIRE MARSHAL  
HAZARDOUS MATERIALS DIVISION  
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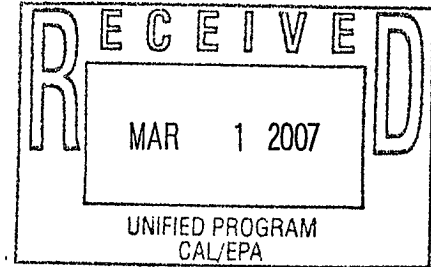


COUNTY OF SAN BERNARDINO  
PUBLIC AND SUPPORT  
SERVICES GROUP

PAT A. DENNEN  
Fire Chief  
County Fire Warden

February 26, 2007

CAL EPA UNIFIED PROGRAM  
1001 "I" STREET, 5<sup>TH</sup> FLOOR  
PO BOX 2815  
SACRAMENTO, CA 95812



**ATTENTION: DON JOHNSON**

## **SUBJECT: SAN BERNARDINO COUNTY CUPA EVALUATION STATUS**

Following is the response to your request for a quarterly status report on deficiencies identified during the November 2005 evaluation of the San Bernardino County CUPA. We continue to follow the Action Plan from our September 2006 Self-Audit for increasing staffing to improve inspection frequency. We also plan to finish the fieldwork related to clarifying the regulatory status of agricultural handlers by the end of this fiscal year.

### Deficiency 1: Inspection Frequency

The CUPA made a 15% increase on annual operating fees for the 2006-2007 fiscal year. As anticipated, many personnel changes have occurred and a substantial amount of time has been required for training of new inspectors. The following changes have occurred since our November status report:

#### December

- 1 lead promoted to supervisor of Field Services
- 1 inspector moved from Field Services to UST
- 1 of new inspectors that was hired into Field Services in November left CUPA

#### January-February (to date)

- 2 UST inspectors retired
- 1 LOP person reassigned to UST
- 1 inspector moved from Field Services to Enforcement
- ER personnel no longer performing routine inspections
- 1 responder from ER transfers into Field Services to be part-time inspector, part-time ER.
- 1 HHW specialist transfers into Field Services to be part-time inspector, part-time ER.
- 2 new inspectors hired to start in Field Services on 3/05/2007.

#### Other announced vacancies

LOP/UST/AST supervisor retiring at end of February.  
1 inspector gives notice of leaving CUPA in April.

Due to the rate of turnover/transfer, of the 13 inspectors currently in the Field Services Unit, 5 are not yet trained for complex inspections, and 3 are not yet cleared for independent inspections. The 2 additional inspectors scheduled to start in March will need to complete 3-6 months of training before being able to conduct independent inspections. All 4 inspectors doing inspections in the UST program (and also

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covering LOP) are in training for additional UST duties formerly performed by the 2 UST inspectors that retired. Therefore ALL inspectors have a substantial commitment either as trainees or trainers (or both) for the remainder of the fiscal year.

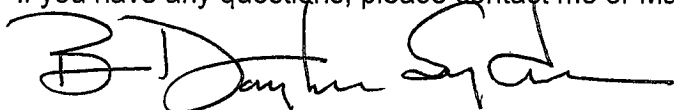
Per your request, the following table summarizes the number of regulated businesses and inspections for the period from 7/1/2006 through 12/31/2006. Please note that the number of businesses active at sometime in the previous 12 months is always greater than the number active as of any one date. Also this data has not gone through the same verification checks that we do annually for summary reporting.

		Inspections from 7/1/2006 to 12/31/2006			
Program	Regulated Businesses (Active sometime in last 12 months)	Routine Inspections	Closure Inspections	Reinspections	Other
HMRRP	6199	790	118	56	14
CalARP	180	13	4	0	0
UST Facilities	871	360	38	27	304
HW Generators	4329	410	98	57	11

## Deficiency 2: Not fully regulating agricultural handlers

Status: We have informed OES personnel of the status of this situation and plan to complete the majority of this project during the annual April and May staff inspection challenge. The status of these facilities will be determined at that time. Agricultural facilities have previously been fee exempt and were not sent routine correspondence (e.g. invoices) so we do not get returned mail or other indicators that a business is out of business. There also has been an inordinate amount of residential and commercial development in the agricultural areas of San Bernardino County. So we have several reasons to believe that the number of generators, handlers, and USTs at agricultural facilities is less than indicated in our permit system. To address the agricultural facilities in a consistent manner, inspections have been limited to those driven by specific concerns. The total number of agricultural facilities inspected July 1, 2006- December 31, 2006 is 6 on 8 different dates, with 2 of those being routine inspections. The CUPA's goal is to inspect all **known** agricultural facilities to verify their existence and to determine their permit and compliance status and to complete the field work on those inspections by the end of May. Accounting for finalization of inspection reports, return to compliance timeframes, and updating of automated information, a final number of confirmed agricultural facilities should be available in July.

If you have any questions, please contact me or Marilyn Kraft or Susan Williams at (909) 386-8401.



**B. DOUGLAS SNYDER, ASSISTANT FIRE MARSHAL  
SAN BERNARDINO COUNTY FIRE DEPARTMENT, HAZARDOUS MATERIALS DIVISION**

BDS:mk

cc: Jennifer Lorenzo (Via e-mail)  
Peter Brierty, Assistant Fire Chief  
Pat Dennen, Fire Chief